

1 Robert T. Mills (Arizona Bar #018853)  
2 Sean A. Woods (Arizona Bar #028930)  
**MILLS + WOODS LAW, PLLC**  
3 5055 North 12th Street, Suite 101  
4 Phoenix, Arizona 85014  
Telephone 480.999.4556  
[docket@millsandwoods.com](mailto:docket@millsandwoods.com)  
[swoods@millsandwoods.com](mailto:swoods@millsandwoods.com)  
5 *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Sarah Johnson, as mother of MC, a minor child.

Case No.: CV-24-03456-PHX-ASB

**PLAINTIFFS' NOTICE OF FILING  
FIRST AMENDED COMPLAINT**

(Assigned to the Honorable Magistrate  
Alison S. Bachus)

**Plaintiffs,**

vs.

Peoria Unified School District; Cave Creek Unified School District; Deer Valley Unified School District; Debbie Burdick; Mark Warren; Robert Miller; Nancy Shaver; Julie Vandenberg; Sydney Meyers; Matthew Owsley; Jennifer Purvis; Janiene Marlow; Jana Miller; Joshua Rawlings; Monica Clay.

### Defendants.

Through undersigned counsel and pursuant to Rule 15.1(b) of the Local Rules of Civil Procedure, Plaintiffs hereby give notice that this same day they filed their First Amended Complaint in this action. Attached as “**Exhibit 1**” hereto is a copy of the First Amended Complaint with additions to Plaintiffs’ original Complaint underlined and deletions indicated via strikethrough.

111

111

111

MILLS + WOODS LAW, PLLC  
5055 North 12th Street, Suite 101  
Phoenix, AZ 85014-2555  
480.999.4556

**RESPECTFULLY SUBMITTED** this 25th day of February 2025.

MILLS + WOODS LAW, PLLC

By /s/ Sean A. Woods

---

Robert T. Mills  
Sean A. Woods  
5055 North 12th Street, Suite 101  
Phoenix, AZ 85014  
*Attorneys for Plaintiffs*

MILLS + WOODS LAW, PLLC  
5055 North 12th Street, Suite 101  
Phoenix, AZ 85014  
480.999.4556

## CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

David K. Pauole  
[dpauale@wwpfirm.com](mailto:dpauale@wwpfirm.com)  
Dkt. D. St. 1

Brett R. Steele  
[bsteele@wwpfirm.com](mailto:bsteele@wwpfirm.com)

**WRIGHT WELKER & PAUOLE, PLC**

10429 S 51st St., Ste. 285

1025 E. JEFFERSON, PHOENIX, AZ 85044

Phoenix, AZ 850  
(480) 961-0040

*Attorneys for Defendant Cave Creek Unified School District*

Meghan M. Baka

[mmb@udallshumway.com](mailto:mmb@udallshumway.com)

---

Eli T. Enger

[ete@udallshumway.com](mailto:ete@udallshumway.com)

## UDALI SHUMWAY

docket@udallshumway.com

docket@udalawsls

1138 N Alton St.  
Mesa, AZ 85201

Mesa, AZ 85201  
(480) 461-5300

Michael F. Hensley

Michael E. Hensley  
mhensley@ishfirm.com

[milnej@jhu.edu](mailto:milnej@jhu.edu)  
John D. Lierman

John D. Lierman  
jlierman@ishfirm.com

[Jheffner@jshillm.com](mailto:Jheffner@jshillm.com)

Clarissa B. Reiman  
june 2016

[creiman@jshfirm.com](mailto:creiman@jshfirm.com)

**JONES, SKELTON &  
40 N.C. 114.**

40 N Central Ave., Ste  
5100 • (312) 252-0414

Phoenix, AZ 85004  
(602) 262-1775

*/s/ Ben Dangerfield*